REMARKS

Claims 4, 7, 9-10, 12-13, 21, 24, 26-27, 29 and 30 are amended for purposes of clarification and not for purposes of patentability. Claims 1-30 are pending in the application. Reconsideration and allowance of the application are respectfully requested. The allowability of claims 2-7, 9-17, 19-24 and 26-30 is acknowledged. However, no amendment is thought to be necessary because the base claims are understood to be patentable over the prior art.

Claims 4, 7, 9-10, 12-13, 21, 24, 26-27 and 30 are understood to be reasonably definite in view of the specification (e.g., paragraphs [0028] – [0030]), and Applicant respectfully traverses the rejection under 35 USC §112, second paragraph. However, the claims are amended for purposes of expediting prosecution, and the rejection should be withdrawn.

Claims 1, 8, 18 and 25 are understood to be novel over "Agrawal" (US patent 6,763,350 to Agrawal et al.). The rejection is respectfully traversed because the Office Action does not show that all the limitations of the claims are taught by Agrawal. For example, Agrawal does not appear to teach selecting one of a plurality of methods based in part on the number of rows in the vertical database table and the number of columns in the horizontal database table (claims 1 and 18).

Neither the cited portions of Agrawal nor other un-cited portions appear to teach a selection of one of a plurality of methods based in part on the number of rows in the vertical database table and the number of columns in the horizontal database table. In the cited col. 5, l. 5-30, Agrawal apparently teaches a single vertical-to-horizontal transformation ("v2h") that is apparently denoted with: Ω. The $\Omega^k(V)$ function creates a horizontal table of arity k+1 from a vertical table, V. Note that the h2v operation converts a horizontal table to a vertical table and is inapplicable to the claim limitations (col. 6, l. 3-9). Thus, there appears to be only a single transformation method, and there is no apparent need for selection based on the number of rows in the vertical database table and the number of columns in the horizontal database table. Therefore, the cited portions of Agrawal do not suggest the claim limitations.

In another un-cited portion of Agrawal, Agrawal suggests "two transformation strategies", "VerticalSQL" and "VerticalUDF", for transforming an SQL query against a

horizontal table and transforming the query into an SQL query for the underlying vertical table (col. 10, l. 34 – col. 11, l. 61). Even though two strategies are mentioned, there is no apparent suggestion that one of these strategies is selected based in part on the number of rows in the vertical database table and the number of columns in the horizontal database table. Furthermore, the transformation strategies are for transforming queries, not for reading from a vertical table and writing to a horizontal table. These transformations apparently read from a horizontal view of the vertical table.
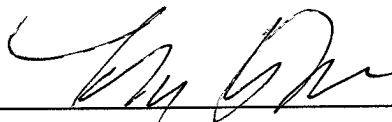
Since neither the cited portions nor other un-cited portions of Agrawal suggest the claim limitations of selecting one of a plurality of methods based in part on the number of rows in the vertical database table and the number of columns in the horizontal database table, the rejection should be withdrawn. Otherwise, if the rejection is maintained, Applicant respectfully requests an explanation of those of Agrawal's elements that are understood to correspond to the selection based on the number of rows in the vertical database table and the number of columns in the horizontal database table.

Claim 8 depends from claim 1, and claim 25 depends from claim 18. Thus, the limitations are not shown to be taught by Agrawal for at least the reasons set forth above.

Withdrawal of the rejections and reconsideration of the claims are respectfully requested in view of the remarks set forth above. No extension of time is believed to be necessary for consideration of this response. However, if an extension of time is required, please consider this a petition for a sufficient number of months for consideration of this response. If there are any additional fees in connection with this response, please charge Deposit Account No. 50-0996 (HPCO.144PA).

Respectfully submitted,

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